

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES DBP/USPS-66 THROUGH 70**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated September 7, 2011. Each interrogatory is stated verbatim and followed by the response. A response to DBP/USPS-71 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-66** Please refer to your response to Interrogatory DBP/USPS-50 subpart [a].

- [a] Your response appears to indicate that none of the facilities being proposed for discontinuance or consolidation have customers who receive delivery service to their street address by a city delivery carrier, rural delivery carrier, or HCR carrier. Please confirm or explain.
- [b] Please explain the process that a customer must follow with respect to filing a change of address order if his/her post office is discontinued and he/she will experience a change in the address to which the mail must be addressed. Please provide separate responses, if necessary, depending on whether the customer chooses the preferred new method of receiving mail or decides to choose his/her own method.

**RESPONSE**

- (a) Not confirmed. It is not necessarily the case that customers of an RAO candidate facility receive delivery from that facility. They may receive delivery from another facility while conducting retail transactions at the RAO candidate facility.
- (b) Postal customers residing in a community where the Post Office is a candidate for discontinuance and are presently receiving delivery to their street address will not need to file a COA. Customers would file a change of address as outlined in the DMM Section 507.2.1.4.

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**DBP/USPS-67** Please refer to your response to Interrogatory DBP/USPS-50 subparts [b] through [i].

- [a] The original Interrogatory asks for specific information which is not covered in your reference to POM Section 682.22. Please provide the information that was requested in the original subparts [b] through [i].
- [b] POM Section 682.22 refers to single-piece-rate Standard Mail. Is this service still available? Are Presorted Standard and Presorted Non-Profit mail forwarded without added charge?
- [c] How will employees at the delivery office be aware that mail [which is normally not forwarded without charge] is being forwarded as a result of a discontinued office and therefore should not be charged postage due?

**RESPONSE**

- (a) (1) There is a \$1.00 verification fee for filing a COA on –line or by phone.  
(2) Mail would be returned in accordance with section 507.1.0 of the Domestic Mail Manual.  
(3) All ancillary endorsement processing will be provided for these Changes of Address.  
(4) First-Class Mail will be forwarded free of charge. Periodicals will be forwarded free of charge for 60 days.  
(5) Package Services mail, with the exception of unendorsed Bound Printed Matter, is forwarded postage due.  
(6) Unendorsed Standard and unendorsed Bound Printed Matter are not forwarded. Periodicals after 60 days of forwarding are not forwarded.  
(7) First-Class Mail will be forwarded for 12 months. Months 13-18 are Returned to Sender with the new address information. After 18 months, it will be Returned to Sender Forwarding Order Expired - Unable to Forward.  
(8) No delay is anticipated.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**RESPONSE to DBP/USPS-67 (continued):**

- (b) The answer to the first question is negative; the POM section needs to be updated. Presorted Standard mail and Non-Profit mail would be forwarded as outlined in section 507.2.3.5 of the DMM.
- (c) After receiving official notification of discontinuance from the District Manager the Manager of Postal operations would provide operational instructions to the Manager or Postmaster of the gaining office.

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**DBP/USPS-68** Please refer to your response to Interrogatory DBP/USPS-52 subpart

[a] What specific sections of USPS Handbook 101 apply?

**RESPONSE**

Chapter 23 -- Analyzing Service Alternatives.

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**DBP/USPS-69** Please refer to your response to Interrogatory DBP/USPS-53. While I may be aware that my local post office sells 29¢ stamps for post card use and Forever stamps for First-Class Mail letters, I am not aware to the percentage of transactions that apply to each of the options. Please respond to the original Interrogatory.

**RESPONSE**

If the question or its predecessor seeks a calculation of the ratio of check marks for each of the alternate channels in relation to the number of USPS brick and mortar check marks in the response to DBP/USPS-6, then it requests a simple arithmetic exercise that does not require postal resources to perform. Perhaps, one could perform the arithmetic and then seek confirmation of its accuracy. Otherwise, this question does not succeed in clearly articulating what it seeks.

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**DBP/USPS-70** Please refer to your response to Interrogatory NPL/USPS-8.

- [a] Please confirm or explain that all of these added amenities that you indicate might be available at the nearest remaining office will still be there whether the local office is closed or not.
- [b] Please confirm or explain that in general the customer who patronizes a specific facility does so after evaluating all of the options and therefore likely will feel that their customer experience has been reduced if their choice of facilities is discontinued.

**RESPONSE**

- (a) The discontinuance of a candidate facility should not impact the services otherwise already provided by the nearest remaining facility.
- (b) The Postal Service lacks sufficient information with which to confirm whether such evaluations are generally performed or whether the discontinuance of a nearby facility is the only factor customers generally consider in assessing whether their retail experience has been diminished. Customers can find that alternate access to postal products and services can be more convenient and efficient.